

Message

---

**From:** Froede, Carl [Froede.Carl@epa.gov]  
**Sent:** 7/20/2021 4:24:55 PM  
**To:** Amoroso, Cathy [Amoroso.Cathy@epa.gov]  
**Subject:** RE: RUSH - RUSH - RUSH #2 --- RE: wastewater FFS comments

**Importance:** High

As I read David's comment – it is what EPA wanted the Administrator to say. He didn't. The Admin decision allows for fisherpeople and an instream calculation of the RAD effluent limits based on a 10E-5 risk to that individual. DOE wants to use a dilution factor so that "exposure" is not based on the discharge point (i.e., end of discharge pipe) rather on what the concentration is at the POE (at the fisherman). At least, that is my understanding. That's why the DOE-based concentration can change moving down the stream. EPA wants a fixed in-stream concentration but I remain confused as to whether it is at the end of pipe or the downstream fisherman. Sorry that I can't address that specific issue.

I would recommend we focus on the EPA Admin decision text (and assigned tasks) in the FFS for now and leave David's hot iron out of these comments. However, if you want to press the issue then include David's comment and let the fur fly ☺.

---

**From:** Amoroso, Cathy <Amoroso.Cathy@epa.gov>  
**Sent:** Tuesday, July 20, 2021 11:26 AM  
**To:** Froede, Carl <Froede.Carl@epa.gov>  
**Subject:** RE: RUSH - RUSH - RUSH - RE: wastewater FFS comments

Ok. I'm still working on the letter. Did you see David's latest comment? Does that need to be added to the comment letter?

---

**From:** Froede, Carl <Froede.Carl@epa.gov>  
**Sent:** Tuesday, July 20, 2021 11:23 AM  
**To:** Amoroso, Cathy <Amoroso.Cathy@epa.gov>  
**Subject:** RUSH - RUSH - RUSH - RE: wastewater FFS comments  
**Importance:** High

Hi Cathy,

I was not looking to revise the PP only to give the public the opportunity to make formal comment (like DOE is doing for the WAC) on the eventual WW discharge limits. The PP states that the WW limits were already set (past tense) and they will be (future tense) set in the FFS. That was what I wanted changed in this FFS.

I am okay (looks great!) with your highlighted text. Please send our letter over to TDEC and include Brad as he is interested in getting the TDEC letter over to Randy Young to sign and issue.

Thanks very much,

Carl

---

**From:** Amoroso, Cathy <Amoroso.Cathy@epa.gov>  
**Sent:** Tuesday, July 20, 2021 10:42 AM  
**To:** Froede, Carl <Froede.Carl@epa.gov>  
**Subject:** RE: wastewater FFS comments

We are going to have to soft pedal that. Whether EPA requires an update to the PP to be developed and put out for comment will come from on-high. Glenn and I had a meeting with Carol, Randall, Blevins, Leif yesterday. I'll fill you on by phone.

I made the following edit to the comment letter.

EPA comment: The text in the D3 FFS citation does not accurately reflect what is conveyed in the approved EMDF PP. Therefore, the D3 FFS must be revised to accurately reflect the chronology of officially issued/approved documents, and provide necessary information to complete the Administrative Record. There was no opportunity for the public to review the Administrative Record regarding wastewater management since it was in dispute when the EMDF PP was issued. EPA recommends additional public involvement opportunities.

---

**From:** Froede, Carl <Froede.Carl@epa.gov>  
**Sent:** Tuesday, July 20, 2021 10:19 AM  
**To:** Amoroso, Cathy <Amoroso.Cathy@epa.gov>  
**Subject:** RE: wastewater FFS comments

Sure.

Have you made a decision about the need for a formal public meeting on the FFS discharge limits?

---

**From:** Amoroso, Cathy <Amoroso.Cathy@epa.gov>  
**Sent:** Tuesday, July 20, 2021 9:44 AM  
**To:** Froede, Carl <Froede.Carl@epa.gov>  
**Subject:** wastewater FFS comments

Hi Carl,  
Steve Stout called me yesterday regarding commenting on the D3 FFS. Can we share our draft comments with TDEC before formal issuance?

Cathy Amoroso, Chief  
Restoration & DOE Coordination Section  
Superfund & Emergency Management Division  
U.S. EPA, Region 4  
404-295-6758